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Attorney for Defendant
MICHAEL ROBERT BOWLING

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. Cr. S 04-0142 MCE
)	
Plaintiff,)	AMENDED
)	PROTECTIVE ORDER
v.)	
)	
MICHAEL ROBERT BOWLING,)	
)	
Defendant.)	Judge: Hon. Peter A. Nowinski
)	
_____)	

The defendant's Motion for Discovery is granted and the government is ordered to provide a bit-for-bit image of the hard-drive seized from the defendant, Michael Robert Bowling. The following is hereby ordered concerning this discovery:

1. The government shall provide defense counsel and her team (including her in-house investigator, her in-house computer systems administrator and her expert in the computer field) with a bit by bit (also known as a mirror image) copy of the hard drive seized from the

1 defendant's computer. The defendant is to provide blank computer media
2 for copying of same if it is requested by the government.

3 2. This mirror image may be possessed and used by the defense team
4 subject to the terms of this Order.

5 3. This material is to be stored when not in use in a locked, secure
6 place accessible only to the defense team. The following individuals
7 are the only individuals authorized to examine this material:

8 (a) counsel for the defendant;

9 (b) the defendant, only if counsel is present;

10 (c) any expert retained by the defendant to assist in the defense
11 of this case;

12 (d) the investigator employed by the Federal Public Defendant and
13 assigned to work on this case;

14 (e) the computer systems administrator employed by the Federal
15 Public Defendant and assigned to work on this case.

16 (f) The Office Manager, Jane Itogawa.

17 4. All individuals who receive access to the material subject to this
18 order shall, prior to receiving access, sign a copy of this order
19 acknowledging that:

20 (a) they have reviewed this Order and understand it;

21 (b) they agree that access to this material is only for the
22 purpose of preparing a defense in this case;

23 (c) they agree that no copies of any images within this material
24 will be made in any manner or for any reason inconsistent with this
25 Order;

26 (d) they agree not to access this material from any computer that
27 is connected to the Internet;

28 (e) they understand that failure to abide by this Order will

1 result in sanctions by the Court and may result in state or federal
2 charges for the possession of or dissemination of child pornography or
3 obscene materials.

4 5. Counsel for the defendant shall maintain the signed copies of this
5 order described in the above paragraph in her files.

6 6. These materials are to be used exclusively in connection with this
7 case and for no other purpose.

8 7. Examination of the data and/or images shall be done in a secure
9 environment which will not expose the materials to other individuals
10 not listed within this Order.

11 8. The hard drive mirror image that is the subject of this order shall
12 be either returned to the government upon the conclusion of this case
13 (including any appeals which may follow) or erased in a manner
14 satisfactory to the government.

15 9. A copy of this Order is to be stored with and kept with the mirror
16 image at all times.

17 Dated: May 11, 2005.

18 _____
19 /s/ Peter A. Nowinski
20 PETER A. NOWINSKI
21 Magistrate Judge
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